

1 ALISON K. BEANUM, State Bar No. 221968
2 alison.beanum@clydeco.us
3 DOUGLAS J. COLLODEL, State Bar No. 112797
douglas.collodel@clydeco.us
3 CLYDE & CO US LLP
4 355 South Grand Avenue, Suite 1400
Los Angeles, California 90071
5 Telephone: (213) 358-7600
Facsimile: (213) 358-7650

6
7 Attorneys for Defendants
8 BOARD OF TRUSTEES OF THE CALIFORNIA
STATE UNIVERSITY and individual defendants
(see complete list of individual defendants on signature page)

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 CHRISTINE DiBELLA,

14 Plaintiff,

15 v.

16 BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY;
17 STEVE RELYEA, Acting Chancellor of
California State University, in his official
capacity; JOLENE KOESTER, incoming
Interim Chancellor of California State
University, in her official capacity; and
18 JEFFREY D. ARMSTRONG, President of
California Polytechnic State University,
San Luis Obispo, in his official capacity;
ERIKA D. BECK, President of California
State University, Northridge, in her official
capacity; SORAYA M. COLEY, President
22 of California Polytechnic State University,
Pomona, in her official capacity; JANE
CLOSE CONOLEY, President of
California State University, Long Beach, in
her official capacity; WILLIAM A.
COVINO, President of California State
University, Los Angeles, in his official
capacity; THOMAS A. CROPPER,
President of California State University
Maritime Academy, in his official capacity;
ADELA DE LA TORRE, President of San
Diego State University, in her official

CASE NO. 4:21-cv-08461-HSG

**STIPULATION AND ORDER SETTING
DEADLINE FOR DEFENDANTS TO
RESPOND TO SECOND AMENDED
COMPLAINT**

1 capacity; GAYLE E. HUTCHINSON,
2 President of California State University,
3 Chico, in her official capacity; TOM
4 JACKSON, JR., President of California
5 Polytechnic State University, Humboldt, in
6 his official capacity; SAÚL JIMÉNEZ
7 SANDOVAL, President of California State
8 University, Fresno, in his official capacity;
9 ELLEN N. JUNN, President of California
10 State University, Stanislaus, in her official
11 capacity; LYNN MAHONEY, President of
12 San Francisco State University, in her
13 official capacity; TOMÁS D. MORALES,
14 President of California State University,
15 San Bernardino, in his official capacity;
16 ROBERT S. NELSEN, President of
17 California State University, Sacramento, in
18 his official capacity; ELLEN J.
19 NEUFELDT, President of California State
20 University, San Marcos, in her official
21 capacity; EDUARDO M. OCHOA,
22 President of California State University,
Monterey Bay, in his official capacity;
THOMAS A. PARHAM, President of
California State University, Dominguez
Hills, in his official capacity; STEPHEN
PEREZ, President of San Jose State
University, in his official capacity; JUDY
K. SAKAKI, President of Sonoma State
University, in her official capacity;
CATHY A. SANDEEN, President of
California State University, East Bay, in
her official capacity; FRAMROZE
VIRJEE, President of California State
University, Fullerton, in his official
capacity; RICHARD YAO, President of
California State University, Channel
Islands, in his official capacity;
LYNNETTE ZELEZNY, President of
California State University, Bakersfield, in
her official capacity; COMPASS GROUP
USA, INC. dba CHARTWELLS HIGHER
EDUCATION,

23 Defendants.

24

25

26 **STIPULATION**

27 Plaintiff CHRISTINE DiBELLA (“Plaintiff”), on the one hand, and Defendants BOARD
28 OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY; STEVE RELYEAE, Acting

1 Chancellor of California State University, in his official capacity; JOLENE KOESTER, incoming
 2 Interim Chancellor of California State University, in her official capacity; and JEFFREY D.
 3 ARMSTRONG, President of California Polytechnic State University, San Luis Obispo, in his
 4 official capacity; ERIKA D. BECK, President of California State University, Northridge, in her
 5 official capacity; SORAYA M. COLEY, President of California Polytechnic State University,
 6 Pomona, in her official capacity; JANE CLOSE CONOLEY, President of California State
 7 University, Long Beach, in her official capacity; WILLIAM A. COVINO, President of California
 8 State University, Los Angeles, in his official capacity; THOMAS A. CROPPER, President of
 9 California State University Maritime Academy, in his official capacity; ADELA DE LA TORRE,
 10 President of San Diego State University, in her official capacity; GAYLE E. HUTCHINSON,
 11 President of California State University, Chico, in her official capacity; TOM JACKSON, JR.,
 12 President of California Polytechnic State University, Humboldt, in his official capacity; SAÚL
 13 JIMÉNEZSANDOVAL, President of California State University, Fresno, in his official capacity;
 14 ELLEN N. JUNN, President of California State University, Stanislaus, in her official capacity;
 15 LYNN MAHONEY, President of San Francisco State University, in her official capacity;
 16 TOMÁS D. MORALES, President of California State University, San Bernardino, in his official
 17 capacity; ROBERT S. NELSEN, President of California State University, Sacramento, in his
 18 official capacity; ELLEN J. NEUFELDT, President of California State University, San Marcos,
 19 in her official capacity; EDUARDO M. OCHOA, President of California State University,
 20 Monterey Bay, in his official capacity; THOMAS A. PARHAM, President of California State
 21 University, Dominguez Hills, in his official capacity; STEPHEN PEREZ, President of San Jose
 22 State University, in his official capacity; JUDY K. SAKAKI, President of Sonoma State
 23 University, in her official capacity; CATHY A. SANDEEN, President of California State
 24 University, East Bay, in her official capacity; FRAMROZE VIRJEE, President of California State
 25 University, Fullerton, in his official capacity; RICHARD YAO, President of California State
 26 University, Channel Islands, in his official capacity; LYNNETTE ZELEZNY, President of
 27 California State University, Bakersfield, in her official capacity (collectively, “Defendants” –
 28 Plaintiff and Defendants together the “Parties” – hereby stipulate and request that the deadline for

1 Defendants to file their response to Plaintiff's Second Amended Complaint ("SAC") be set at
2 March 31, 2022. This request to continue deadlines is based on the following good cause:

- 3 1. On April 21, 2022, Plaintiff filed a 63-page SAC for Preliminary and Permanent
4 Injunctive Relief, Declaratory Relief, and Damages. Dkt. No. 36.
- 5 2. The SAC names twenty five (25) new defendants, including STEVE RELYEA, the
6 Acting Chancellor of California State University, JOLENE KOESTER, the
7 incoming Interim Chancellor of California State University, in her official
8 capacity, and the Presidents of each California State University campus.
- 9 3. Due to the complexity and broad scope of the SAC, Defendants require additional
10 time to investigate the new allegations and prepare their responsive pleadings.
- 11 4. Further, because the individual defendants' responsive pleading deadlines are
12 different than the responsive pleading deadline for the Board of Trustees of the
13 State of California, setting a global deadline allows for a joint filing.
- 14 5. Pursuant to the above, the Parties jointly stipulate that a new deadline of May 31,
15 2022 shall be set for Defendants to respond to the SAC.

16 **IT IS SO STIPULATED.**

17 Date: May 19, 2022

REIN & CLEFTON, Attorneys at Law

18
19 /s/ Aaron M. Clefton, Esq.
20 By AARON M. CLEFTON, Esq.
 Attorneys for Plaintiff
 CHRISTINE DiBELLA

21 Date: May 19, 2022

CLYDE & CO US LLP

22
23 /s/ Alison K. Beanum, Esq.
24 By ALISON K. BEANUM, Esq.
 Attorney for Defendant
 BOARD OF TRUSTEES OF THE
 CALIFORNIA STATE UNIVERSITY; STEVE
 RELYEA, Acting Chancellor of California State
 University, in his official capacity; JOLENE
 KOESTER, incoming Interim Chancellor of
 California State University, in her official capacity;
 and JEFFREY D. ARMSTRONG, President of
 California Polytechnic State University, San Luis
 Obispo, in his official capacity; ERIKA D. BECK,

1 President of California State University, Northridge,
2 in her official capacity; SORAYA M. COLEY,
3 President of California Polytechnic State University,
4 Pomona, in her official capacity; JANE CLOSE
5 CONOLEY, President of California State
6 University, Long Beach, in her official capacity;
7 WILLIAM A. COVINO, President of California
8 State University, Los Angeles, in his official
9 capacity; THOMAS A. CROPPER, President of
10 California State University Maritime Academy, in
11 his official capacity; ADELA DE LA TORRE,
12 President of San Diego State University, in her
13 official capacity; GAYLE E. HUTCHINSON,
14 President of California State University, Chico, in
15 her official capacity; TOM JACKSON, JR.,
16 President of California Polytechnic State University,
17 Humboldt, in his official capacity; SAÚL JIMÉNEZ
18 SANDOVAL, President of California State
19 University, Fresno, in his official capacity; ELLEN
20 N. JUNN, President of California State University,
21 Stanislaus, in her official capacity; LYNN
22 MAHONEY, President of San Francisco State
23 University, in her official capacity; TOMÁS D.
24 MORALES, President of California State
25 University, San Bernardino, in his official capacity;
26 ROBERT S. NELSEN, President of California State
27 University, Sacramento, in his official capacity;
28 ELLEN J. NEUFELDT, President of California
State University, San Marcos, in her official
capacity; EDUARDO M. OCHOA, President of
California State University, Monterey Bay, in his
official capacity; THOMAS A. PARHAM, President
of California State University, Dominguez Hills, in
his official capacity; STEPHEN PEREZ, President
of San Jose State University, in his official capacity;
JUDY K. SAKAKI, President of Sonoma State
University, in her official capacity; CATHY A.
SANDEEN, President of California State University,
East Bay, in her official capacity; FRAMROZE
VIRJEE, President of California State University,
Fullerton, in his official capacity; RICHARD YAO,
President of California State University, Channel
Islands, in his official capacity; LYNNNETTE
ZELEZNY, President of California State University,
Bakersfield, in her official capacity

1 **FILER'S ATTESTATION**

2 Pursuant to Local Rule 5-1, I hereby attest that on May 19, 2022, I, Alison Beanum,
3 attorney with Clyde & Co US LLP, received the concurrence of Aaron Clefton, Esq. in the filing
4 of this document.

5 */s/ Alison K. Beanum*
6 Alison K. Beanum

7

8 **ORDER**

9 Pursuant to the stipulation of the parties and for good cause shown, the deadline for
10 Defendants to respond to the SAC shall be continued to May 31, 2022.

11 **IT IS SO ORDERED.**

12 Dated: 5/20/2022

13 
Honorable Haywood S. Gilliam, Jr.
U.S. District Court Judge

15
16
17
18
19
20
21
22
23
24
25
26
27
28